

January 29, 2004

Jennifer J. Johnson
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W
Washington, DC 20551

Re: Docket No. R- 1167; Regulation Z
Docket No. R-1168; Regulation B
Docket No. R-1169; Regulation E
Docket No. R-1170: Regulation M
Docket No. R-1171: Regulation DD

Dear Honorable Governors:

Thank you for the opportunity to comment on the proposed changes to disclosure standards under the referenced regulations listed above. Central Valley Community Bank is a bank with \$330 million in assets located in California's heart of the Central Valley. Central Valley Community Bank has seven branches, a Real estate, Agricultural and SBA Loan departments providing banking services to individuals and business primarily in Fresno and Sacramento counties. The populist within these areas we serve is very diverse in its make up of individuals and income levels. Most of the businesses located in these counties are diverse and family owned business (small to large), light industry, to corporation's structures. And being in the Central Valley, Agricultural is big business from the small family to large corporate farms, which for most part all these business are locally owned.

In the proposed rules to amend the disclosure standards, the Board is proposing to apply the formatting requirements now applicable to Regulation P (Financial Privacy) to other Regulations B, E, M, Z and DD. The bank generally supports efforts to promote uniformity in banking regulations. By applying uniformity it benefits the consumer and banks are playing on level playing field.

However, we believe there is no need to make the changes as proposed. To propose that the reference regulations be formatted as in Regulation P does not make sense for one the federal banking agencies have been discussing that the Privacy disclosure need to be improve to ensure that they are more understandable and useful to the consumer. If this is the model to be followed it appears that the changes need to be made to Regulation P privacy disclosures before tackling and changing the other regulations, which would be more confusing to the consumer with constant change. In addition there would be additional cost to banks in programs changes, cost to printing and reprinting disclosures. There would be cost related to environment, to make the changes has proposed. It would

require, the use of more paper to provide these disclosure at the standards proposed, will have an in pack on our environment the use of trees, production of paper that eventually might end up in land fills. What these cost are, is unknown at this time and almost in possible to projected.

Need for changes are not supported. We believe that the existing disclosures requirements be “Clear and Conspicuous”, has been address for a long time in the regulations. The existing standard have been used and adopted within the consumer protection regulations since the 1970’s which has guided the banking industry and provided a degree of consistency to the consumer.

We asking the board to reconsider there proposal and thank them for giving us the opportunity to comment.

Sincerely

Ray Vandervelde
Vice President and Compliance Officer